

# MAYER • BROWN

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April 6, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Ex Parte* Notification IB Docket Nos. 11-109 and IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090 and SAT-MOD-20151231-00091

Dear Ms. Dortch:

On April 4, 2017, Valerie Green, Executive Vice President and Chief Legal Officer of Ligado Networks, LLC (“Ligado”), and Howard Waltzman and the undersigned of Mayer Brown LLP, met with Nick Degani and Rachael Bender of Chairman Pai’s office to discuss issues raised in the above-referenced dockets.

We explained that Ligado is focused on building an advanced satellite-terrestrial network to serve the emerging industrial Internet of Things and critical infrastructure industries such as rail, trucking and aviation. Ligado envisions combining its terrestrial network capacity with the ubiquitous coverage afforded by its satellites to provide end users a pervasive, highly secure and ultra-reliable offering. FCC approval of Ligado’s license modification applications would not only promote American innovation and leadership in 5G, but would generate hundreds of millions of dollars in private investment in infrastructure and thousands of American jobs.

With respect to the pending applications for license modification, we reported that Ligado has worked extensively with the Federal Aviation Administration (“FAA”) to identify and resolve concerns from the aviation community, and to develop an approach that is safety-focused and complies with all applicable FAA standards. Ligado proposes to establish power levels in the 1526-1536 MHz band that not only protect certified aviation devices, but *all* GPS devices, including noncertified aviation receivers.

Likewise, we discussed the recent National Advanced Spectrum and Communications Test Network (“NASCTN”) study of the effect of Long Term Evolution signals on Global Positioning System (“GPS”) devices that operate in the GPS L1 frequency band. The NASCTN testing, performed by highly skilled government scientists and engineers, affirmed earlier studies showing that devices in every category of GPS receiver are unaffected by Ligado’s proposal, and confirmed that GPS and Ligado’s network can coexist. Ligado’s progress with the FAA and the results of the NASCTN report demonstrate the validity of Ligado’s pending applications.

With respect to the 1675-1680 MHz band, we reiterated Ligado’s position that the Commission should consider a notice of proposed rulemaking as soon as possible.

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Pursuant to Section 1.1206 of the Commission's rules, I am filing this *ex parte* notification electronically for inclusion in the record of the above-referenced proceedings.

Sincerely,

/s/

Angela E. Giancarlo

cc: Rachael Bender  
Nick Degani